Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Mona and UK Chamber of Shipping SoCG (F03)

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Image of an offshore wind farm

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Prepared by:

RPS/Nash Maritime Ltd

Prepared for:

Mona Offshore Wind Ltd.

Signatories

Signed	
Name	
Date	
Position	
For	The Chamber of Shipping Ltd.

Signed	
Name	
Date	
Position	
For	Mona Offshore Wind Limited

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
ALARP	As Low As Reasonably Practicable
CoS	Chamber of Shipping
CRNRA	Cumulative Regional Navigation Risk Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
IALA	International Association of Lighthouse Authorities
IoMSPC	Isle of Man Steam Packet Company
IWRAP	IALA Waterway Risk Assessment Program
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MNEF	Marine Navigation Engagement Forum
NRA	Navigation Risk Assessment
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

Units

Unit	Description
kV	Kilovolts

1 Statement of Common Ground between Mona Offshore Wind Project and the Chamber of Shipping

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Mona Offshore Wind Limited (hereafter referred to as 'the Applicant') and the Chamber of Shipping (CoS), together the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Mona Offshore Wind Project.

1.1.1.2 The need for a SoCG between the Applicant and the CoS is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 07 June 2024.

1.1.1.3 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters. The SoCG will also specify the actions needed to address the issues and will facilitate further discussion between the parties. The SoCG will be updated during the Mona Offshore Wind Project Examination and submitted at the Deadlines indicated in the Rule 6 letter.

1.1.2 Mona Offshore Wind Project Elements under CoS' Remit

1.1.2.1 The CoS is the trade association for the UK shipping industry, representing 200 members, operating 900 vessels equalling 18 million gross tonnes in capacity, across all vessel sectors. The CoS's interest lies in ensuring the impact to navigational safety, commercial operation, and environmental performance are avoided or minimised as far as possible. The elements of the Mona Offshore Wind Project which may affect the interests of the CoS are Work Numbers 1 to 4, covering the intertidal area, seaward of Mean High Water Springs (MHWS), and offshore works. These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) and Schedule 14 (Marine Licence) of the Draft DCO F05 (C1 F05).

1.1.2.2 This SoCG covers the following topics of relevance to the CoS, seaward of MHWS:

- Shipping and navigation
- Socio-economics.

1.1.3 Overview of Mona Offshore Wind Project

1.1.3.1 Mona Offshore Wind Project is a proposed offshore wind farm located in the east Irish Sea. The Mona Offshore Wind Project will include both offshore and onshore infrastructure and consist of:

- Mona Array Area: This is where the wind turbines, Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), inter-array cables, interconnector cables and offshore export cables will be located
- Mona Offshore Cable Corridor and Access Areas: The corridor located between the Mona Array Area and the landfall up to MHWS in which the offshore export cables will be located and in which the intertidal access areas are located

- Intertidal access areas: The area from MHWS to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities
- Landfall: This is where the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling
- Mona Onshore Development Area: The area in which the landfall, Mona Onshore Cable Corridor, Mona Onshore Substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), operational access to the Mona Onshore Substation and the connection to National Grid infrastructure will be located
- Mona Onshore Substation: This is where the new substation will be located, containing the components for transforming the power supplied from the offshore wind farm up to 400 kV
- Mona 400 kV Grid Connection Cable Corridor: The corridor from the Mona Onshore Substation to the National Grid substation.

1.1.4 Approach to SoCG

1.1.4.1 This SoCG has been developed during the pre-examination phase and will be progressed during the examination phase of the Mona Offshore Wind Project. In accordance with discussions between the parties, the SoCG is focused on those issues raised by the CoS within its response to Scoping, Section 42 consultation and as raised through the Marine Navigation Engagement Forum (MNEF), stakeholder meetings and hazard workshops that have underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by the CoS during the post-application phase (i.e. relevant representations and pre-examination meetings).

1.1.4.2 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreement Log.

1.2 Summary of SoCG

1.2.1 Overview

1.2.1.1 This SoCG has outlined the consultation that has taken place between the parties during the pre-application and post-application phase of the Mona Offshore Wind Project. The agreement logs present the position reached on 30 September 2024 (Deadline 3).

1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and Not Agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.

Topic	Agreement status
Shipping and navigation	Ongoing point of discussion
Socio-economics	Ongoing point of discussion

1.3 Summary of Consultation

1.3.1.1 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with the CoS, relevant to shipping and navigation during the pre-application phases of the Mona Offshore Wind Project. Table 1.3 below provides a summary of the consultation undertaken by the Applicant with the CoS, relevant to shipping and navigation during the post-application phases of the Mona Offshore Wind Project.

Table 1.2: Summary of pre-application consultation with the CoS.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
10/11/2021	MNEF meeting	Non-statutory	• Project introduction and proposed approach • Site selection in relation to shipping and navigation constraints • Impacts of COVID-19 on data collection • Impacts to ferry operators (Safety and Commercial) • Relation of impacts on ferry routes with regulation and guidance • Sensitivity of ferry operator schedules.
14/02/2022	Consultation Meeting	Non-statutory	• Relation of impacts on ferry routes with regulation and guidance • Site selection in relation to shipping and navigation constraints • Impacts to ferry operators (Safety and Commercial) • Need for a cumulative assessment • Adverse weather routeing decision making • Need for collaborative engagement in assessment.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
06/05/2022	MNEF meeting	Non-statutory	• Project update • Cumulative impacts of multiple projects on ferry operations • How the cumulative impacts will be assessed or examined • Impacts of three Irish Sea projects on Isle of Man economy/society • Extent of incident data • Safety of navigating in gaps • Consequences of allisions with wind turbines.
18-19/08/2022	Navigation Simulations	Non-statutory	• Full Bridge Navigation Simulations with Isle of Man Steam Packet Company (IoMSPC) masters, with CoS in attendance, to assess safety of navigation for existing routes and deviated routes for the Preliminary Environmental Information Report (PEIR).
23-24/08/2022	Navigation Simulations	Non-statutory	• Full Bridge Navigation Simulations with Stena Line masters, with CoS in attendance, to assess safety of navigation for existing routes and deviated routes for the PEIR
10/10/2022	MNEF meeting	Non-statutory	• Project update • Application process • Approach to cumulative assessment • Introduction to Morgan/Morecambe combined transmission project.
10/10/2022 / 11/10/2022	Hazard Workshop	Non-statutory	• Cumulative Hazard Workshop of the Mona Potential Array Area to inform the PEIR.
18/01/2023	MNEF meeting	Non-statutory	• Project update on boundary amendments and how commitments will be tested post PEIR.
02/06/2023	Section 42 response	Statutory	• Impacts (safety and commercial) on vital shipping services • PEIR consultation given proposed changes to the Mona Array Area boundary • Financial costs of fuel and increased emissions including impacts to hinterland supply chains and scheduling. • Inclusion of the proposed Mooir Vannin Offshore Wind Farm Scoping Boundary within the cumulative effects assessment
22/06/2023 / 23/06/2023	Navigation Simulations	Non-statutory	• Full Bridge Navigation Simulations with Seatruck Ferries, with CoS in attendance, to assess safety of navigation for existing routes and deviation routes.
21/09/2023	MNEF meeting	Non-statutory	• Project update and review of boundary changes.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
28/09/2023/ 29/09/2023	Hazard Workshop	Non-statutory	• Cumulative Navigation Risk Assessment (NRA) hazard workshop undertaken to inform the Environmental Statement.
08/02/2024	MNEF meeting	Non-statutory	• Project update • Summary of work undertaken since last MNEF • Update to Cumulative NRA • DCO process.

Table 1.3: Summary of post-application consultation with the CoS.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
12/07/2024	Consultation meeting	Non-statutory	• Review of structure of SoCG • Review of Agreement Log.
25/07/2024	Consultation meeting	Non-statutory	• Review of structure of SoCG • Review of Agreement Log.
20/09/2024	Consultation meeting	Non-statutory	• Review of Agreement Log.
27/11/2024	Consultation meeting	Non-statutory	Review of Agreement Log.

1.4 Agreement log

1.4.1 Overview

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.4 below.

Table 1.4: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties.
Not agreed, but not material	The matter is not considered to be agreed between the parties, but is not deemed material.
Not agreed	The matter is not considered to be agreed between the parties.

1.4.1.2 Table 1.5 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2).

1.4.2 Shipping and navigation

Table 1.5: Agreement Log between the parties on shipping and navigation.

Reference Number	Discussion point	Applicant's Position	CoS Position	Status
Environmental Impact Assessment (EIA)				
CoS.SAN.1	Policy and planning	The assessment has identified appropriate plans and policies relevant to shipping and navigation and has attended to them within the assessment.	Agreed	Agreed
CoS.SAN.2	Consultation	The CoS have been adequately consulted on shipping and navigation matters to date.	Agreed	Agreed
CoS.SAN.3	Surveys	The vessel traffic surveys were conducted in accordance with Marine Guidance Note (MGN) 654 (MCA, 2021).	Agreed	Agreed
CoS.SAN.4	Baseline environment	Sufficient primary and secondary shipping and navigation data has been collated to appropriately characterise the baseline environment.	Agreed	Agreed
CoS.SAN.5		The potential effects identified within the chapter represent a comprehensive list of potential effects on shipping and navigation from the Mona Offshore Wind Project.	Agreed	Agreed
CoS.SAN.6	Assessment methodology	The Formal Safety Assessment approach to the assessment of effects is deemed appropriate for the purposes of predicting potential effects on shipping and navigation receptors.	Agreed	Agreed
CoS.SAN.7		The assessment within Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) and Volume 2, Chapter 7: Shipping and navigation (APP-059) has been undertaken in line with relevant shipping and navigation legislation and guidance including MGN 654.	Agreed	Agreed

Reference Number	Discussion point	Applicant's Position	CoS Position	Status
CoS.SAN.8		The quantitative risk modelling methods (e.g. International Association of Lighthouse Authorities (IALA) Waterway Risk Assessment Program (IWRAP) and encounter modelling) used to assess collision and allision risk are appropriate and align with relevant guidance.	Agreed	Agreed
CoS.SAN.9		The navigation simulations were conducted in a fair and reasonable manner, and are appropriate for informing Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098).	Agreed	Agreed
CoS.SAN.10		The Hazard Workshop was undertaken allowing adequate stakeholder input into the risk assessment and are reflected within the NRA conclusions laid out in Section 1.9.8 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098).	Agreed	Agreed
CoS.SAN.11		All relevant cumulative projects have been identified and are included within the shipping and navigation assessment.	Agreed	Agreed
CoS.SAN.12		The assessment of effects has been undertaken based on an appropriate maximum design scenario for shipping and navigation.	Agreed	Agreed
CoS.SAN.13	Assessment of the effects from the project alone (in isolation)	All hazards and impacts identified as relevant to the Mona Offshore Wind Project have been assessed within the shipping and navigation assessment.	Agreed	Agreed
CoS.SAN.14		All hazards have been assessed to either Medium Risk – Tolerable if ALARP or Broadly Acceptable and there are no unacceptable hazards.	Agreed	Agreed

Reference Number	Discussion point	Applicant's Position	CoS Position	Status
CoS.SAN.15		The mitigation measures described within Table 1.10 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) are appropriate. Further mitigation measures marked in grey colour 'not adopted' in Table 1.43 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) would be disproportionate and therefore all medium risk hazards can be considered ALARP without the need for additional risk control measures.	Agreed	Agreed
CoS.SAN.16		The Mona Offshore Wind Project would not interfere with the use of recognised sea lanes essential to international navigation.	Agreed	Agreed
CoS.SAN.17		The Mona Offshore Wind Project could have potential significant operational effects on lifeline ferry services between Liverpool and Douglas. Impacts on other ferry services and strategic routes are minor and not considered to have significant operational impacts.	Agreed	Agreed
CoS.SAN.18		All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) would not be significant in EIA terms with proposed mitigation measures in place.	Agreed	Agreed
CoS.SAN.19	Assessment of the effects from the project cumulatively excluding Mooir Vannin Offshore Wind Farm Scoping Boundary	All hazards and impacts relevant to the Mona Offshore Wind Project in combination with cumulative projects (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) have been assessed within the shipping and navigation assessment.	Agreed	Agreed
CoS.SAN.20		All hazards relating to the cumulative scenario (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) have been assessed to either Medium Risk – Tolerable if ALARP or Broadly Acceptable and there are no unacceptable hazards.	Agreed	Agreed

Reference Number	Discussion point	Applicant's Position	CoS Position	Status
CoS.SAN.21a		The mitigation measures described within Table 1.10 of Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098) are appropriate. Further mitigation measures marked as 'not adopted' in Table 46 of the Cumulative Regional Navigation Risk Assessment (CRNRA) (Appendix E of F6.7.1 Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098)) would be disproportionate and therefore all medium risk hazards relating to the cumulative scenario (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) can be considered ALARP without the need for additional risk control measures. (relates to risk control options 1 to 9 (inclusive) and 11 in Table 46).	Agreed	Agreed
CoS.SAN.21b		As per CoS.SAN.21a but relates to risk control option 10 in Table 46 of the Cumulative Regional Navigational Risk Assessment (CRNRA) (Appendix E of F6.7.1 Volume 6, Annex 7.1: Navigational Risk Assessment (APP-098)). Emergency Towing Vessel (ETV) provision was not adopted and was discussed at the hazard workshops and given that vessel allisions were scored as Medium Risk and relatively unlikely, therefore the very high cost of procuring and operating an ETV was disproportionate.	When considering the additional risk from cumulative projects in the Irish Sea over the period of operation (30+ years), the Chamber view is that additional towing capability or resource may be required. The Chamber does not have a position on whether such capability is afforded through dedicated Emergency Towage Vessels as per RCO 10 of Table 46 or via alternative means, for example via project vessels with capability or through the Coastguard Agreement for Salvage and Towage (CAST).	Ongoing point of discussion The Parties met 26/11/24 and agreed the Chamber would consider this matter in responding to ExQ2 Q2.15.3 for Deadline 5. Following Deadline 5, the Parties agreed to reconvene to finalise positions and update the ExA as necessary.
CoS.SAN.22		The Mona Offshore Wind Project in combination with cumulative projects (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) would not interfere with the use of recognised sea lanes essential to international navigation.	Agreed	Agreed

Reference Number	Discussion point	Applicant's Position	CoS Position	Status
CoS.SAN.23		The Mona Offshore Wind Project in combination with cumulative projects (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) could have potential significant operational effects on lifeline ferry services between Liverpool and Douglas, Heysham and Douglas, Heysham and Belfast, and Liverpool and Belfast.	Agreed	Agreed
CoS.SAN.24		Operational impacts on other ferry services and strategic routes are not considered to be significant.	Agreed	Agreed
CoS.SAN.25		All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) assessed for the cumulative scenario (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) have been assessed not to be significant in EIA terms with proposed mitigation measures in place.	Agreed	Agreed
CoS.SAN.26	Assessment of the effects from the project cumulatively including Mooir Vannin Offshore Wind Farm Scoping Boundary	All hazards and impacts relevant to the Mona Offshore Wind Project in combination with cumulative projects (including Mooir Vannin Offshore Wind Farm Scoping Boundary) have been assessed within the shipping and navigation assessment.	Agreed	Agreed
CoS.SAN.27		Allision and collision risk hazards between the Morgan Array Area and Mooir Vannin Scoping Boundary were assessed through the CRNRA addendum as unacceptable. All other hazards relating to the cumulative scenario (including Mooir Vannin) have been assessed to either Medium Risk – Tolerable if ALARP or Broadly Acceptable.	Agreed	Agreed

Reference Number	Discussion point	Applicant's Position	CoS Position	Status
CoS.SAN.28		The Mona Offshore Wind Project in combination with cumulative projects (including Mooir Vannin Offshore Wind Farm Scoping Boundary) would not interfere with the use of recognised sea lanes essential to international navigation.	Agreed	Agreed
CoS.SAN.29		The Mona Offshore Wind Project in combination with cumulative projects (including Mooir Vannin Offshore Wind Farm Scoping Boundary) could have potential significant effects on the lifeline ferry services that were assessed within the CRNRA. This includes those between Liverpool and Douglas, Heysham and Douglas, Heysham and Belfast, and Liverpool and Belfast, and excludes the route between Belfast and Douglas.	Agreed	Agreed
CoS.SAN.30		Operational impacts on other ferry services and strategic routes are not considered to be significant.	Agreed	Agreed
CoS.SAN.31		All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) assessed for the cumulative scenario (including Mooir Vannin Offshore Wind Farm Scoping Boundary) have been assessed not to be significant in EIA terms with proposed mitigation measures in place.	Agreed	Agreed

Reference Number	Discussion point	Applicant's Position	CoS Position	Status
CoS.SAN.32	Decommissioning	A decommissioning programme will be submitted for approval prior to any commencement of works to develop the Mona Offshore Wind Project. A draft of the decommissioning plan for the Mona Offshore Wind Project will be submitted prior to construction commencing. The decommissioning plan and programme will be updated during the Mona Offshore Wind Project lifespan to take account of changing best practice and new technologies. The scope of the decommissioning works would be determined by the relevant legislation and guidance at the time of decommissioning. At the end of the operational lifetime of the Mona Offshore Wind Project, it is anticipated that all structures above the seabed or ground level will be completely removed where feasible and practical. The decommissioning sequence will generally be the reverse of the construction sequence and involve similar types and numbers of vessels and equipment. Foundations would likely be cut below the seabed at a level that means they will not create a hazard for fishing or shipping. All inter-array and interconnector cables may be retrieved and, if retrieved, will be disposed of onshore. In addition to this, offshore export cables may be retrieved up to the exit pits (below MHWS) for cables installed under the intertidal area, and if retrieved they will be disposed of onshore. The Mona Offshore Wind Project position is that cable protection (cable ducting, rock dumping, etc) will preferably be left in situ, but removal has been assessed as the Maximum Design Scenario. At this time, it is difficult to foresee what techniques will be used to remove cables during decommissioning. However, it is not unlikely that equipment similar to that which is used to install the cables could be used to reverse the burial process and expose them.	The Chamber accepts and recognises that the project decommissioning will be determined by the relevant legislation and guidance at the time of decommissioning. Nevertheless, the Chamber strongly recommends the full decommissioning and removal of all infrastructure from the site, including all wind turbines, topsides, export, inter-array and interconnector cables, and foundations to a safe depth below the seabed. The Chamber notes the applicant's position that cabling "may be retrieved" and firmly recommends it is as failure to enact full removal of cabling may hinder or encumber future activity or development, as well as provide safety hazard to vessels, for example through cabling which becomes exposed and presents anchoring or snagging risk.	Agreed

1.4.3 Socio-economics

Table 1.6: Agreement Log between the parties on socio-economics.

Reference Number	Discussion point	Applicant's Position	CoS Position	Status
EIA				
CoS.SE.1	Consultation	The Applicant undertook adequate consultation with the CoS on potential impacts on socio-economics.	Adequate consultation of the socio-economic impact on shipping sector was not undertaken for the lifeline ferry services assessed by the NRA as having potential significant operational effects.	Not agreed, but not material
CoS.SE.2	Assessment of the socio economic effects from the project cumulatively	The Applicant undertook adequate analysis on the potential socio-economic impacts on the shipping sector in line with the agreed scope of the assessment (at Scoping) and based on consultation feedback through the development of the Environmental Statement. National Policy Statement EN-3 defines a lifeline ferry route as follows: '"Lifeline ferries" provide an essential service between islands or an island and the mainland on which the occupiers of the island rely for transportation of passengers and goods'. Routes to and from the Isle of Man were identified as the only lifeline ferry routes potentially affected by the Mona Offshore Wind Project.	Adequate analysis of the socio-economic impact on shipping sector was not undertaken for the full range lifeline ferry services assessed by the NRA as having potential significant operational effects. Services between the UK mainland and Ireland and Northern Ireland are of strategic importance to the UK and Isle of Man and for Volume 4, Chapter 3: Socio-economics (APP-077) to only consider socio-economic impact to Isle of Man is an overly narrow scope. The developer via the MNEF did not undertake engagement on environmental impact for the shipping and navigation from deviation of routeing, nor engage with industry on their methodology for calculating environmental impact as detailed within Volume 8, Annex 2.1: Greenhouse gas assessment technical report (APP-182), specifically data validity of emissions from vessels and operations. The Isle of Man Territorial Sea Committee (IoMTSC) state in their Local Impact Report 'As the Isle of Man is dependent on daily regular deliveries of foodstuffs and other consumable items, including medicines, additional cancellations will have an impact on daily life and could result in additional costs for the retailers on account of the delays or cancellations.' The Chamber considers this impact upon the hinterland and supply chain supplied as supported by IOMSP as not insignificant.	Ongoing point of discussion 26/11/2024: The Chamber is engaging with its members to ascertain their acceptance of the engagement they are receiving from the Applicant in parallel with the Examination.

Reference Number	Discussion point	Applicant's Position	CoS Position	Status
CoS.SE.3	Consultation	The Applicant is now engaging with relevant individual stakeholders to seek agreement on the socio-economic impacts. Such engagement is operational and commercial in nature.	The Chamber welcomes this engagement which it considers overdue and should be undertaken earlier in the process.	Agreed

1.5 References

MCA (2021). MGN 654. Available: https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping. Accessed June 2024.